

FILED

August 19, 2022

22 AUG 19 PM 4:20

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS

BY RN
DEPUTY CLERK

Plaintiff: Stephan Ricks

Case Number: 22-CV-00773-LY

Subject: Plaintiff, Stephan Ricks' answer to Judge Hightower's court order of August 8, 2022

Plaintiff, Stephan Ricks: moves the court to enter an order taking JUDICIAL NOTICE of the following

facts:

Business address of DMA Properties, as listed by the Texas Secretary of State's office:

Diana McIver, President/CEO and registered agent

4101 Park Stone Heights Dr. – Ste. 310

Austin, Texas, 78746

Plaintiff, Stephan Ricks: moves the court to enter an order taking JUDICIAL NOTICE of the

following facts:

Nicole Guptil, acting property manager, and Roxanne Meriquil [sic], administrative

assistant.

Plaintiff will show that there has been a concerted effort on the part of all of these

defendants to harass and retaliate against plaintiff for making requests for reasonable accommodations and modifications to plaintiff's apartment. Also, defendants and staff members have done this by 1. many delays, denying that the defendants had received plaintiff's requests; 2. giving plaintiff false information about plaintiff's requests for reasonable accommodations and modifications to the current and future apartments; and 3. refusing to meet and confer with plaintiff with regard to these reasonable accommodation and modification requests; and 4. retaliation against plaintiff for making these reasonable accommodation and modification requests.

Moreover, plaintiff will show that these requests for reasonable accommodations and modifications are consistent with and pursuant to Title 8 of the Fair Housing Act of 1968, and Title 3 of the Americans With Disabilities Amendment of 1990, and also Title 5, which prohibits retaliation against persons who are qualified under these protected classes, such as plaintiff Stephan Ricks, who is blind.

Stephan A. Ricks
All Rights Reserved